

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CBV, INC.,)	
)	
Plaintiff,)	
v.)	C.A. No. 1:21-cv-01456-GBW
)	
CHANBOND, LLC, DEIRDRE LEANE,)	
and IPNAV, LLC,)	
)	
Defendants.)	

**STIPULATION AND [PROPOSED] ORDER
EXTENDING DEADLINE TO FILE MOTIONS FOR SUMMARY JUDGMENT**

WHEREAS, on October 3, 2023, Plaintiff CBV, Inc. (“CBV”) and Defendants Deirdre Leane and IPNAV, LLC (collectively, the “Leane Defendants”) filed a Stipulation and [Proposed] Order Regarding Summary Judgment Motions (the “Summary Judgment Briefing Stipulation,” D.I. 232);

WHEREAS, on October 4, 2023, the Court entered the Summary Judgment Briefing Stipulation as an Order (the “Summary Judgment Briefing Order”);

WHEREAS, on October 9, 2023 and October 12, 2023, CBV and Leane Defendants filed motion for leave to move for summary judgment (the “Summary Judgment Letter Motions,” D.I. 233, 234); and

WHEREAS, on December 19, 2023, the Court granted the Summary Judgment Letter Motions and order briefing on the parties’ respective summary judgment motions to proceed on the schedule set forth in the Summary Judgment Briefing Order;

WHEREAS, the parties have agreed, subject to the approval of the Court, to slightly modify the briefing schedule in the Summary Judgment Briefing Order;

IT IS HEREBY STIPULATED AND AGREED, between and among the parties hereto, through their undersigned counsel and subject to the approval of the Court, that:

1. CBV's deadline to file its summary judgment motion and opening brief is extended to January 15, 2024.
2. The Leane Defendants' deadline to file their answering brief in opposition to CBV's summary judgment motion and cross-motion for summary judgment is extended to February 12, 2024.
3. The remaining dates in the Summary Judgment Briefing Order remain unchanged.

DATED this 29th day of December, 2023.

**BUCHANAN INGERSOLL &
ROONEY PC**

/s/ Geoffrey G. Grivner

Geoffrey G. Grivner (No. 4711)
Kody M. Sparks (No. 6464)
500 Delaware Avenue, Suite 720
Wilmington, DE 19801
(302) 552-4200
geoffrey.grivner@bipc.com
kody.sparks@bipc.com

Attorneys for CBV, Inc.

**TROUTMAN PEPPER HAMILTON
SANDERS LLP**

/s/ James H. S. Levine

James H.S. Levine (No. 5355)
Hercules Plaza, Suite 5100
1313 N. Market Street
P.O. Box 1709
Wilmington, DE 19899-1709
(302) 777-6500
james.levine@troutman.com

*Attorneys for IPNAV, LLC and Deirdre
Leane*

IT IS SO ORDERED, this ____ day of _____, 20 ____.

UNITED STATES DISTRICT JUDGE
Gregory B. Williams